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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

A.M., an individual,

Case No. 3:21-cv-01674-MO

Plaintiff,

vs.

OMEGLE.COM LLC,

Defendant.

**JOINT MOTION FOR EXTENSION OF
DISCOVERY & PTO DEADLINES**

JOINT MOTION

Pursuant to Fed. R. Civ. P. 16, LR 16-3 and the Court's instruction (*see* ECF No. 63), the parties jointly propose the following revised case deadlines (*see* ECF Nos. 4 & 31) as follows:

Amendment of Pleadings and February 28, 2023
Joining of All Parties

Completion of Discovery July 31, 2023

Filing Dispositive Motions August 31, 2023

Joint ADR Report:

Plaintiff proposes 30 days following Order on dispositive motions

Defendant proposes July 31, 2023

Expert Disclosures/Discovery 30 days following Order on dispositive motions

Joint Proposed Pretrial Order 30 days following Order on dispositive motions

Trial

Plaintiff proposes November 13, 2023

Defendant proposes that the Court set the date

CONCLUSION

For the foregoing reasons, the Court should modify the existing case deadlines (ECF Nos. 4 & 31) as set forth above.

Dated this 4th day of January, 2023.

VOGT & LONG PC

s/ Barbara C. Long

Barbara C. Long, OSB No. 122428

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and

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Dated this 4th day of January, 2023.

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